

June 17, 2021

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The Honorable Kevin N. Fox  
United States District Court for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 228  
New York, New York 10007

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**Re: *Bilalov v. Gref & Sberbank CIB USA, Inc.*, No. 20-CV-09153 (AT)(KNF)**

Dear Judge Fox:

This firm represents Defendant Sberbank CIB USA, Inc. (“SCIB”) in the above-captioned matter. Together with Debevoise & Plimpton LLP, which represents Defendant Herman Gref (“Gref”), we respectfully submit this letter to inform Your Honor that, pursuant to Federal Rule of Civil Procedure 15(a)(2), Defendants consent to Plaintiff’s request to amend his complaint and file the Second Amended Complaint attached as Exhibit A to the Declaration of Irina Shpigel. Dkt. No. 37-1. For the avoidance of doubt, Defendants reserve all rights to challenge, including by a motion to dismiss, the sufficiency of the proposed jurisdictional allegations and claims contained in the Second Amended Complaint.

Defendants have furnished their written consent based on Plaintiff’s agreement, subject to the Court’s approval, to extend SCIB’s and Gref’s time to answer, move, or otherwise respond to Plaintiff’s Second Amended Complaint until twenty-one days after the Second Amended Complaint is filed. There have been no prior requests to extend the time to respond to the Second Amended Complaint. As to the prior iteration of the complaint (the First Amended Complaint), there were two requests to extend the time for Defendants to respond. The first request was denied by Your Honor on the grounds that the parties had not provided a sufficient explanation for the then-requested 90-day extension (Dkt. No. 26), and the second request sought a shorter extension that was granted by Judge Torres (Dkt. No. 29).

We thank the Court for its consideration.

Respectfully submitted,

/s/ Kimberly A. Havlin

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Copies to Counsel of Record (via ECF Filing)